



MEMO ENDORSED

THE LAW OFFICES OF ALBERT VAN-LARE

125 MAIDEN LANE, SUITE 510 NEW YORK, NEW YORK 10038

Tel. 212 608-1400 Fax 877-505-6103

Email yanlareesq@aol.com

November 22, 2021,

Hon. Kenneth M. Karas
United States District Court Judge
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4178

Re: *Williams-Barr v. NYS Dept. of Corrections and Community Supervision, No. 18-cv-9131 (KMK)*

**PLAINTIFF'S REQUEST FOR AN EXTENSION OF TIME FOR THE PARTIES TO FILE
PRE-MOTION LETTER AND RESPONSE TO THE PRE-MOTION LETTER, AND AN
ADJOURNMENT OF THE CONFERENCE SCHEDULED FOR DECEMBER 13, 2021**

Dear Judge Karas:

I represent the plaintiff in the aforementioned matter. I write with Defendant's consent to respectfully request that the court allows Defendant until January 7, 2022 to file its pre-motion letter, with Plaintiff's response due by January 14, 2022. We are also requesting that the conference scheduled for December 13, 2021 be adjourned to a day convenient for the court in the week of January 24, 2022. This is the first request from Plaintiff to extend the time for filing of the pre-motion letter and to adjourn the conference.

The parties have cooperated in discovery in this case and had a tight schedule because a lot of the witnesses are uniformed personnel, and appearances were pursuant to subpoenas. Notwithstanding the subpoenas, the parties still had to work out a reasonable deposition schedule for the witnesses. Fact discovery is scheduled to end December 10, 2021 pursuant to Judge Krause's Order granting Plaintiff's request for extension of time to complete fact discovery. Discovery is scheduled to end December 17, 2021. In light of the extension of time to complete fact discovery, Plaintiff respectfully requests the court to extend the time to file pre-motion letters and an adjournment of the December 13, 2021 conference as stated above.

Thank you for your attention to this matter.

Respectfully submitted,

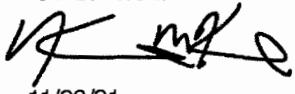
Albert Van-Lare

Albert Van-Lare

Cc VIA ECF: Julinda Dawkins
Assistant District Attorney
State of New York Office of the Attorney General
28 Liberty Street
New York, NY 10005

Granted. The 12/13/21 conference is adjourned to 2/15/22, at 11:30
The pre-motion letters are to be filed by the dates noted herein. There
will be NO further extensions in this three-year-old case.

So Ordered.



11/23/21